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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

TIFFANY YIP, et al.,

Plaintiffs,

vs.

BANK OF AMERICA, N.A.,

Defendant.

A.M. HAMILTON, an individual, on behalf of  
 himself and all others similarly situated,

Plaintiff,

vs.

BANK OF AMERICA, N.A.,

Defendant.

Case No. 2:21-cv-01254-RFB-EJY

Consolidated with:  
 2:21-cv-02149-APG-BNW

**STIPULATION AND ORDER TO  
 EXTEND TIME TO RESPOND TO  
 FIRST AMENDED COMPLAINT**

**(First Request)**

Case No. 2:22-cv-00374-RFB-EJY

Plaintiffs Tiffany Yip, et al. and A.M. Hamilton (“Plaintiffs”) and Bank of America, N.A. (“Defendant,” and together with Plaintiffs, the “Parties”), by and through their respective counsel, hereby submit this stipulation for an extension of time for Defendant’s responsive pleadings or motions in *Yip v. Bank of America*, No. 2:21-cv-01254, and *Hamilton v. Bank of America*, No. 2:22-cv-00374. This is the first request for an extension of either of these deadlines.

Defendant’s deadline for responding to the First Amended Complaint in *Yip* is April 20, 2022. *Yip*, ECF. No. 28. Defendant’s response to the *Hamilton* Complaint is due on May 9, 2022. *Hamilton*, ECF. No. 8. However, Defendant has filed a motion to consolidate *Hamilton*

1 with *Yip* for all pretrial purposes, including briefing on Defendant's anticipated motion to dismiss.  
2 *Yip* ECF No. 32; *Hamilton*, ECF No. 10. Plaintiffs will oppose the motion.

3 The Parties ask that the Court continue the current deadlines for Defendant's response to  
4 the complaints until after the Court has ruled on Defendant's motion to consolidate. Doing so  
5 will allow the Court to first rule on the issue of consolidation before the Parties proceed with the  
6 motion to dismiss briefing, and may avoid the filing of potentially unnecessary briefs. In order to  
7 avoid further delays based on amendments to the complaints, the Parties also agree that the  
8 *Hamilton* plaintiff may file an amended complaint prior to the Court's ruling on Defendant's  
9 Motion to Consolidate.

10 The Parties therefore stipulate as follows:

11 Defendant's anticipated motion or motions to dismiss shall be due 30 days after this  
12 Court's ruling on the Motion to Consolidate.

13 Plaintiffs' opposition(s) to Defendant's motion(s) shall be due 30 days after the deadline  
14 for Defendant's motion(s).

15 Defendant's reply(ies) shall be due 21 days after the deadline for Plaintiffs' opposition(s).

16 The *Hamilton* plaintiff may amend his complaint until the Court rules on the Motion to  
17 Consolidate (this shall not limit his ability to amend further to the extent permitted by the Federal  
18 Rules of Civil Procedure or the Court).

19 IT IS SO STIPULATED.  
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Dated: April 12, 2022

By: /s/ Michael Kind  
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*Attorneys for Plaintiff A.M. Hamilton*

IT IS SO ORDERED.

4891-9765-6091

Dated: April 12, 2022

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**ORDER**

  
UNITED STATES MAGISTRATE JUDGE

DATED: April 12th, 2022